UNITED STATES BANKRUPTCY COURT DISTRICT OF SOUTH DAKOTA

| In re: |) Bankr. No. 10-10146 | |
|------------------------|---------------------------------|----|
| |) Chapter 11 | |
| VEBLEN EAST DAIRY |) | |
| LIMITED PARTNERSHIP, |) SUPPLEMENT TO DEBTOR'S MOTION | ΟN |
| Tax ID No.: 20-8870979 |) FOR AUTHORITY TO USE CASH | |
| |) COLLATERAL AND REQUEST FOR | |
| Debtor. |) PRELIMINARY HEARING | |
| |) | |

In support of this Motion for Authority to Use Cash Collateral, Debtor states:

- 1. I have filed a Motion for Authority to Use Cash Collateral ("Motion") (Doc 16) seeking a preliminary and final hearing on that matter pursuant to Fed. R. Bankr. P. 4001(b).
- 2. I ask that notice of the preliminary hearing on the Motion be reduced under Fed.R.Bankr.P. 9006(c) and a deadline of noon on July 12, 2010 be set for objecting to the Motion for the following reasons:
 - a. The expenditures identified in Exhibit A to this motion must be made to avoid irreparable harm to the Debtor's estate. The principal assets of the estate are milk cows which must be properly fed and maintained to assure their health and welfare and the ongoing cash flow of the Debtor.
 - b. Through July 27, 2010, the amount of cash collateral which must be spent to avoid irreparable harm is \$1,715,000, consisting of the following categories of expenses on Exhibit A to the Motion: management fees (expenses directly related to the Debtor's operations), animal heath, bedding, breeding, feed, freight and trucking, fuel, herd replacement, insurance, labor, nutrient management, parlor repairs, and supplies.

WHEREFORE, I respectfully request an order reducing notice and setting July 12, 2010 at noon as the deadline for objecting to this Motion.

Dated: July 8, 2010

/s/ Thomas M. Tobin

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AND

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| Veblen East | | |
|-------------------------------------|----------------|---------|
| Profit & Loss | | |
| 11011101101 | Projected | Paid |
| | Today- 7.26.10 | |
| | roddy rizorio | |
| Expenses | | |
| Bank Service Charges/FSB | 250.00 | |
| Cleaning Supplies | | |
| Consulting Fees/Cargill/ Feb-May | 43,070.76 | 7.12.10 |
| Legal Fees | 0.00 | |
| License & Permit Fees & Visas | | |
| Management Fees/PRM | 39,000.00 | 7.12.10 |
| Meals & Lodging | 0.00 | |
| Office Expense | 0.00 | |
| Office Supplies | 500.00 | |
| Travel Expenses | - | |
| Total Administration Expense | 82,820.76 | |
| Drugs (Stockmen's cv) | 16,000.00 | Weekly |
| Transition Drugs (Stockmen's) | 4,400.00 | Weekly |
| Vet Supplies Expense (Stockmen's) | 1,500.00 | Weekly |
| Veterinarian Expense (New Provider) | 1,800.00 | |
| Total Animal Health Expenses | 23,700.00 | |
| Sand Bedding | 0.00 | |
| Straw Bedding | - | |
| Total Bedding Expense | 0.00 | |
| Total Bodding Expondo | 0.00 | |
| Breeding Drugs (Stockmen's) | 5,000.00 | Weekly |
| Preg Checks/PRM | | |
| Semen/MN SS | - | |
| Total Breeding Expenses | 5,000.00 | |
| BST - Elanco AH | 18,016.00 | 7.16.10 |
| Total Alfalfa - High Various | 63,900.00 | Weekly |
| Total Alfalfa - Low | 40,095.00 | Weekly |
| Corn | 44,895.00 | Weekly |
| Corn- High Moisture | ++,000.00 | comy |
| Corn Silage | 51,000.00 | |
| Liquid Feed | 18,000.00 | 7.20.10 |
| Gluten | | Weekly |
| | 48,321.00 | Weekly |
| Hay - Dry Cow | 5,500.00 | vveekiy |
| Mineral Munean Lakes Nutrition | 800.00 | 7 20 10 |
| Mineral - Munson Lakes Nutrition | 118,000.00 | 7.20.10 |
| Other Feed | 500.00 | |

| | | 40,405.00 | | Maakk |
|---------------------------------------|-----|------------|-----|-------------|
| SBM | | 40,485.00 | | Weekly |
| Soy Hulls | | 19,836.00 | | Weekly |
| Straw | | 27,705.00 | | Weekly |
| WDG | | 10,410.00 | | Weekly |
| Weighbacks | | - | | |
| Total Feed Expense | | 489,447.00 | | |
| | | | | |
| Milk Hauling | | 0.00 | | |
| Trucking - Livestock (Opitz, Skeeter) | | 6,000.00 | | 7.20.10 |
| Total Freight and Trucking | | 6,000.00 | | |
| | | | | |
| Diesel (Baus cv) | | 12,200.31 | | Weekly |
| Diesel - Feed Center (Baus) | | 10,000.00 | | Weekly |
| Fuel - Other (Grobe's) | | 1,000.00 | | Weekly |
| Gas (Grobe's | | 200.00 | | Weekly |
| Gas - Feed Center (Grobe's | | 150.00 | | Weekly |
| Total Fuel | | 23,550.31 | | |
| Net cow sales | | | | |
| Dry Cow Feed Income/Expense | | | | |
| Herd Replacement - Cows Purchased | | 618,425.00 | | Weekly |
| Herd Replacement - Culls | | | | |
| Herd Replacement - Deads | | | | |
| Herd Replacment - Purchases | 210 | 304,500.00 | 210 | 7.12 & 7.19 |
| Total Herd Replacement Expense | | 922,925.00 | | |
| | | | | |
| Cattle Insurance | | 4,500.00 | | 7.10.10 |
| Liability Insurance | | | | |
| Insurance Expense - Other | | | | |
| Total Insurance Expense | | 4,500.00 | | |
| · | | | | |
| Total Interest Expense | | 0.00 | | |
| · | | | | |
| Workmans Comp Insurance | | | | |
| Labor Expense | | 157,245.00 | | 7.20.10 |
| Total Labor Expense | | 157,245.00 | | |
| • | | , | | |
| Building Repairs | | 1,500.00 | | |
| Equipment Repairs | | 14,000.00 | | |
| Equipment Storage | | ., | | |
| Feed Center Repairs | | 5,500.00 | | |
| Feed Truck Repairs | | 1,500.00 | | |
| Parlor Repairs (Schumacher's cv) | | 3,500.00 | | |
| Total Repairs & Maintenance | | 26,000.00 | | |
| Total Repairs & Maintenance | | 26,000.00 | | |
| Farm Supplies (Grobe's cv) | | 4,039.76 | | |
| , , | | | | 7 12 10 |
| Parlor Supplies (GEA Westfalia) | | 12,525.00 | | 7.12.10 |

| Shop Supplies | 1,000.00 | |
|----------------------|--------------|---------|
| Supplies - Other | | |
| Total Supplies | 17,564.76 | |
| Property Taxes | | |
| Sales Tax | | |
| Total Taxes | 0.00 | |
| Garbage | 1,200.00 | |
| Gas & Electric | 66,000.00 | 7.15.10 |
| LP | 3,500.00 | |
| Telephone / Internet | 1,500.00 | 7.18.10 |
| Water | 200.00 | |
| Total Utilities | 72,400.00 | |
| Total Expense | 1,831,152.83 | |